



September 8, 2008

John Bunyak
Air Resources Division
National Park Service
Denver, Colorado 80225

Re: Comments of BP America Regarding the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Revised Phase I Report; 73 *Fed. Reg.* (39039 (July 8, 2008))

Dear Mr. Bunyak,

BP welcomes the opportunity to provide comments on the revised FLAG Phase I report. As offered in the Federal Register notice, BP requests the Federal Land Managers (FLMs) to conduct a public meeting to further discuss the issues raised by the report.

BP is one of the nation's largest producers of domestic oil and natural gas with extensive operations and development in the areas proximal to federal Class 1 areas. Many of our development plans require analysis pursuant to the National Environmental Protection Act (NEPA) and under the New Source Review (NSR) permitting process pursuant to the Clean Air Act. As the FLAG guidelines affect the NEPA and NSR analyses, and the FLM's assessment of Air Quality Related Values in Class 1 areas, the guidelines are critically important to BP.

BP shares the view that the guidelines should be a "living document" that is modified regularly to reflect "best science." Much progress has been made in understanding and analysis of atmospheric science; however, the revised draft FLAG guidelines do not reflect best science. BP is concerned that application of the FLAG guidelines will result in overly conservative air quality impact assessments that could impose unnecessary burdens on energy development and projects. Overly conservative assessments will not benefit the permit authorities, stakeholders, or the Federal Land Managers as it would create false perceptions of environmental effects and potentially lead to less than optimal policy and decision-making.

BP believes that the FLAG guidelines should be built on a firm foundation of best science and should be consistent with Clean Air Act regulations and provisions regarding air quality assessment and ambient air quality standards. Specific comments on the science and analyses are provided in detail in the formal comment submission of the American Petroleum Institute (API), which BP supports.

BP believes that natural gas development can be done in a manner that simultaneously promotes energy production and provides necessary environmental protection that is based on sound science.

Thank you for your consideration of BP's and API's comments. We look forward to further discussion with the Federal Land Managers at an upcoming public meeting.

Sincerely,

A handwritten signature in dark ink, appearing to read "Karen St. John". The signature is fluid and cursive, with the first name "Karen" written in a larger, more prominent script than the last name "St. John".

Karen St. John
Director, Regulatory Affairs
BP America

cc: Gordon Reid Smith, BP